



PHYSICIANS FOR SOCIAL RESPONSIBILITY • LOS ANGELES

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April 13, 2005

Lucetta Dunn

Director

California Department of Housing and Community Development

1800 Third Street

P.O. Box 952050

Sacramento, CA 94252-2050

APR 18 2005

RE: CPVC (State Clearinghouse No. 2000091089) - Oppose

Dear Ms. Dunn:

Physicians for Social Responsibility-Los Angeles represents over 5,000 medical professionals and supporters in Southern California. I write on their behalf drawing attention to potential harms arising from using chlorinated polyvinyl chloride (CPVC) for drinking water piping in residential buildings.

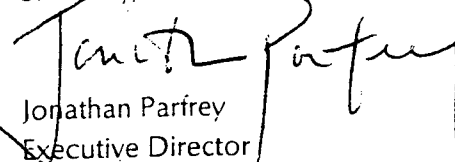
The Department of Housing and Community Development (HCD) proposal requiring municipalities to allow CPVC in residential buildings portends tremendous environmental health implications. A Negative Declaration will not suffice. The agency should study CPVC more fully in an environmental impact report, and, in that process, assess health effects from using CPVC over its entire life, from creation to disposal.

Many of the chemicals used in manufacturing CPVC – dioxins, furans, hexachlorobenzene, and PCBs – are *persistent organic pollutants*, soon to be eliminated by the Stockholm Convention. Because of its chlorine content when CPVC is burned, either in a building fire, or disposed via trash incineration or in a landfill fire, highly toxic dioxins will be released into the environment. CPVC-associated chemicals are known or suspected carcinogens, mutagens, and/or reproductive or developmental toxins.

There is further recent compelling evidence that CPVC toxins may leach into drinking water during years of use.

At the very least, HCD should pursue a full EIR on use of CPVC in residential buildings.

Sincerely,


Jonathan Parfrey
Executive Director

